



U.S. Department of Justice

*United States Attorney
Southern District of New York*

December 11, 2023

VIA ECF

The Honorable John P. Cronan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Reclaim the Records, et ano., v. U.S. Dep't of State*, 23-cv-01650 (JPC)

Dear Judge Cronan:

This Office represents the U.S. Department of State (the “Government” or “State Department”) in the above-referenced action brought under the Freedom of Information Act. We write to respectfully request a 45-day extension of the current briefing schedule for the Government’s motion for summary judgment.

The undersigned will be handling the defense of this matter while AUSA Salk is on parental leave. The reason for this request is that the State Department needs additional time to put together its materials in support of its motion, particularly in light of the highly technical nature of the issues presented by a database that will need to be addressed. The extension is also requested because of the upcoming holiday and vacation schedules of the undersigned and at the agency. The Government therefore proposes extending the briefing schedule as follows:

- Deadline for the Government’s motion for summary judgment extended from December 18, 2023, to February 1, 2024;
- Deadline for Plaintiffs’ opposition to the Government’s motion extended from January 29, 2024, to March 14, 2024; and
- Deadline for the Government’s reply to Plaintiff’s opposition extended from February 26, 2024, to April 12, 2024.

This is the Government’s second request for an extension of the summary judgment briefing schedule. Plaintiffs consent to the Government’s request.

We thank the Court for its consideration of this letter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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